

1 K. RYAN HELMICK, ESQ.
Nevada State Bar No. 12769
2 LAW OFFICE OF RYAN HELMICK, P.C.
6830 S. Rainbow Blvd. Ste. 200-A
3 Las Vegas, Nevada 89118
(702) 435-6425
5 Ryan@thedefensefirm.com
6 Attorney for Defendant

7 UNITED STATES DISTRICT COURT
8 DISTRICT OF NEVADA

9 UNITED STATES OF AMERICA)

10 Plaintiff,)

11 vs.)

12 PATTI A. KERN,)

13 Defendant.)

CASE NO.: 2:19-cr-00032-RFB-VCF

14 **STIPULATION TO CONTINUE SENTENCING**

15 (Eighth Request)

16 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A. Trutanich,
17 United States Attorney, Christopher Chiou, Assistant United States Attorney, and United States
18 Department of Justice Trial Attorneys Timothy Finley and Daniel Zytnick, and K. Ryan Helmick,
19 Esq., of the LAW OFFICE OF RYAN HELMICK, P.C., counsel for Defendant, Patti A. Kern, that
20 the sentencing currently set for August 14, 2023, be vacated and continued until approximately
21 February 2024 by this Honorable Court.

22 This Stipulation is entered into based on the following reasons:

- 23 1. Counsel for the Defendant has spoken to the Defendant and the Defendant has no
24 objection to the requested continuance;
- 25 2. Counsel for the Defendant has spoken to counsel for the Government and he has no
26 objection to the requested continuance;
- 27 3. The Defendant is still cooperating with the Government and it is anticipated that her
28 testimony may be needed for purposes of trial in *United States v. Castro, et al.*, 2:19-
cr-0295-GMN-NJK, now set a competency hearing on August 22, 2023
- 1 4. Denial of this request for continuance would result in a miscarriage of justice;
- 2 5. For all of the above-stated reasons, the ends of justice would be best served by a

continuanace of sentencing date until after the *Castro* trial is concluded;

6. This is the eighth request for a continuance of the sentencing date in this case.

6 DATED this 27th day of July, 2023

NICHOLAS A. TRUTANICH
UNITED STATES ATTORNEY

LAW OFFICE OF RYAN HELMICK, P.C.



/s/ Timothy Finley
TIMOTHY FINLEY
DANIEL ZYTNIK
Trial Attorneys
US Department of Justice
P.O. Box 386
Washington, D.C. 20044
Attorney for Plaintiff
(202) 307-0050, (202) 598-8337

K. RYAN HELMICK, ESQ.
Nevada State Bar No. 12769
LAW OFFICE OF RYAN HELMICK, P.C.
6830 S. Rainbow Blvd. Set. 200-A
Las Vegas, Nevada 89118
Attorney for Defendant
(702) 435-6425

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA

Plaintiff,

vs.

PATTI A. KERN,

Defendant.

CASE NO.: 2:19-cr-00032-RFB-VCF

FINDINGS OF FACT

Based upon the pending Stipulation or the parties, and good cause appearing therefor, the Court find that:

1. Counsel for the Defendant has spoken to the Defendant and the Defendant has no objection to the requested continuance;
2. Counsel for the Defendant has spoken to counsel for the Government and he has no objection to the requested continuance;
3. The Defendant is still cooperating with the Government and it is anticipated that her testimony may be needed for purposes of trial in *United States v. Castro, et al.*, 2:19-cr-0295-GMN-NJK, now set for a competency hearing on August 22, 2023.

CONCLUSIONS OF LAW

1. Denial of this request for continuance would result in a miscarriage of justice;
2. For all of the above-stated reasons, the ends of justice would be best served by a continuance of sentencing date;
3. This is the eighth request for a continuance of the sentencing in this case.

ORDER

IT IS THEREFORE ORDERED that the sentencing currently scheduled for August 14, 2023 at 10:30 a.m. in Courtroom 7C be continued to February 15th of 2024 at 8:30 a.m.

DATED this 31st day of July, 2023.



UNITED STATES DISTRICT JUDGE